

**THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** § **CASE NO. 22-33652**  
**RHEA RADFORD** §  
§  
§  
§  
**DEBTOR(S)** § **CHAPTER 13**

**DEBTOR'S RESPONSE TO TRUSTEE'S OBJECTION TO CONFIRMATION**

**[Doc. # 34]**

**THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

**COMES NOW**, Rhea Radford Debtor herein and files this Response to the Chapter 13 Trustee's Objection to Confirmation:

Debtor's plan is proposed in good faith. The justification for the step-up payment in month 25 is shown on debtor's budget schedules filed on 2/20/2023 at Docket #24, paragraph 13, which explains Debtor's current circumstances and her future ability to make the increased scheduled Chapter 13 plan payment.

WHEREFORE, Debtor prays that the Court deny the relief sought by the Chapter 13 Trustee, and for such further relief as is just.

Dated: April 13, 2023

Respectfully submitted,

By: /s/ Aaron W. McCardell Sr.  
Aaron W. McCardell Sr.  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above Debtor's Response to Trustee's Objection to Confirmation was served by U.S. mail and/or electronically to all parties in interest on this 13<sup>th</sup> day of April 2023.

**CHAPTER 13 TRUSTEE**

David G. Peake  
Chapter 13 Trustee  
9660 Hillcroft  
Suite 430  
Houston, Texas 77096-3856

Rhea Radford  
3526 Landsdowne Court  
Pearland, Texas 77584

/s/ Aaron W. McCardell Sr.  
Aaron W. McCardell Sr.